

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Jerry Johnson

Debtor

Chapter 13

Bankruptcy No. 24-10005-PMM

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 01/02/2024.
3. This Motion to Dismiss has been filed for the following reason(s):
 - The Debtor(s) has/have failed to commence or continue making timely payments to the Trustee as required by 11 U.S.C. Section 1326.
 - There has been unreasonable delay as defined by 11 U.S.C Section 1307(c)(1) by the above-captioned Debtor(s).
 - The Plan does not appear to be feasible.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 04/08/2024

Respectfully submitted,

/s/ Rolando Ramos, Esq.

Rolando Ramos, Esq.

for

Scott F. Waterman, Esq.

Standing Chapter 13 Trustee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

Telephone: (610) 779-1313